

**Supporting Statement for a Continuing Collection RE: Visitor Survey for
Cape Hatteras National Seashore
OMB Control Number 1024-0258**

A. Justification

- 1.** Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

The National Park Service (NPS) is requesting renewal of an existing information collection that received emergency clearance on May 21, 2009. RTI International, under contract with Cape Hatteras National Seashore (CAHA), has completed a survey of local businesses under the emergency approval and began conducting a visitor survey at CAHA. The current request for a renewal is to continue the visitor survey. The survey gathers information that will be used in the planning and rulemaking processes for CAHA's Off-Road Vehicle (ORV) Management Plan/Environmental Impact Statement (EIS) and ORV regulation. The continuation of the visitor survey with the current renewal request will allow the NPS to have a seasonally representative sample of CAHA visitors. By having seasonal representation, the NPS will be better able to have a complete picture of visitors and visitor preferences for park management and for the final economic analysis.

The NPS is under a court order (**ATTACHMENT A**) to complete the planning process for managing ORVs by December 30, 2010 and to complete the promulgation of a final rule by April 1, 2011. The visitor survey contains questions asking respondents to evaluate the potential effects of the revised alternatives. Federal statutes, including Executive Order (E.O.) 12866—as amended by E.O. 13258 of February 26, 2002 and E.O. 13422 of January 18, 2007—require that NPS conduct a benefit-cost analysis of the proposed regulation and an analysis of the impact of the regulation on small businesses under the Regulatory Flexibility Act (RFA) of 1980 (see **ATTACHMENTS B, C, D, and E**). The EIS must also include a description of the impact of the alternatives on the socioeconomic environment of the park, including recreational visitation. The visitor survey collects information on baseline visitor and trip characteristics and potential behavioral changes by visitors in response to the alternative proposals.

- 2.** Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection. [Be specific. If this collection is a form or a questionnaire, every question needs to be justified.]

This is to continue an on-going collection. The collection was originally approved under an emergency clearance, and this request is to continue that collection beyond the period approved as part of the emergency clearance. Data from the collection will be used by the NPS to develop the socioeconomic analysis for the EIS, the rulemaking benefit-cost analysis, and the Regulatory Flexibility Act analysis for small businesses. The EIS and the benefit-cost analysis require a general description of the socioeconomic environment and the visitor population. After the general description, data are needed to analyze the economic impacts of the action alternatives relative to the no-action alternative. Economic impacts include changes in producer surplus and consumer surplus. Estimating changes in producer surplus

require assumptions about the impact that the action alternatives will have on revenue and business activity. Estimating changes in consumer surplus requires assumptions about behavioral changes on the part of visitors in response to the management alternatives.

In the EIS, the NPS will analyze the impacts of the proposed action alternatives relative to the no-action baseline, using a set of scenarios for each alternative to reflect the uncertainty of future impacts. The information from the visitor survey is one source of data for developing the scenarios.

Visitors will be intercepted on the ocean beaches at CAHA and a short survey will be administered. The survey contains appropriately worded questions for out-of-town visitors and for local residents of the Outer Banks and Manteo, NC. Justification for the specific questions is as follows:

- **INTRODUCTION**: These questions will be used in a non-response bias analysis.
- **SECTION A. DETERMINE APPROPRIATE SURVEY**: Zip code is used to identify local residents vs. out-of-town visitors. This section of the questionnaire also determines which out-of-town visitors are day users and which are staying overnight. Questions differ slightly depending on the group interviewed. For example, overnight visitors are asked question about how many nights they are staying, which village they are staying in, and which type of lodging they are using.
- **SECTION B. SURVEY OF OUT-OF-TOWN VISITORS ON OVERNIGHT TRIPS/OUT-OF-TOWN VISITORS ON DAY TRIPS**: Questions B03 – B07 distinguish frequent visitors from first-time or infrequent visitors and characterize the geographic diversity of visitors. This information will improve understanding of variability in responses to the action alternatives. Questions B08 – B14 describe possible management approaches to ORV and pedestrian use in CAHA and ask the visitor about their likely behavioral response. These questions will be used to inform development of the EIS scenarios describing the possible range of reactions to the different action alternatives. Two versions on these questions will be used, and each respondent will be randomly assigned to one version. Version A consists of Questions B09 – B12. Version B consists of Questions B13 – B14. The two versions are designed to capture the features of different action alternatives. Each respondent will only answer one of the versions in order to keep the survey short. Questions B15 - B22 describe visitors' current trips. Questions B24 and B25 measure uses of other beaches in the U.S. These questions help characterize the socioeconomic environment at CAHA. The questions about trip characteristics and use of other beaches will be analyzed in conjunction with the responses to the behavioral-response items to examine differences in responses by trip characteristics. Because out-of-town visitors spend the most money in the local economy, changes in their visitation patterns will have a larger impact. Question B23 asks the respondents' willingness to buy a 12-month permit to drive on the beaches at CAHA for one of three prices (\$10, \$25, and \$100). Revenue from sales would be used to manage beach driving. The prices will be randomly assigned so that a visitor responds to only one price. The permit is being considered by the park as part of the action alternatives. Question B26 is a measure of

general satisfaction with the current trip that is routinely included in visitor surveys and also measures the current socioeconomic environment at the park.

- [SECTION C IS SKIPPED IN THE SURVEY SCRIPT]
- SECTION D. LOCAL RESIDENTS OF THE OUTER BANKS AND MANTEO ON DAY TRIPS: Questions D01 – D08 distinguish frequent from infrequent visitors among local residents. This information will improve understanding of variability in response to the action alternatives among people who live on the Outer Banks. As in the survey of out-of-town visitors, questions D9 – D12 describe possible management approaches to ORV and pedestrian use in CAHA and ask local residents about their likely behavioral responses to these alternatives. These questions will be used to inform development of the EIS scenarios describing the possible range of reactions to the different action alternatives. Questions D13 – D16a describe local residents' current visit to the beaches, as well as their use of the Seashore over the previous two years. These questions also help understand variability in responses to the action alternatives. Question D16b is identical to the item in the out-of-town visitor survey that asks respondents' willingness to buy a 12-month permit to drive on the beaches at CAHA for one of three prices (\$10, \$25, and \$100). The prices will be randomly assigned so that a visitor responds to only one price. The permit is being considered by the park as part of the action alternatives and the revenue will be used to manage driving on the beaches. Questions D17 – D18 measure uses of other beaches in North Carolina and the U.S. Along with the earlier questions about current and recent use of the Seashore, these will be analyzed in conjunction with the responses to the behavioral-response questions to help understand differences in local residents' responses. Questions D19 – D22 ask about residents' ownership of, or employment in, businesses on the Outer Banks. Answers to these questions help to characterize the socioeconomic environment of the Outer Banks and will assist in understanding variability in responses to the action alternatives. Finally, Question D23 in the local resident survey is a measure of general satisfaction with the current trip that is routinely included in visitor surveys of this type.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

This information will be collected via on-site surveys for the visitor survey. No automated data collection will take place, although the visitor survey will use electronic hand-held devices for data input in the field. These devices allow automatic branching between questions and versions of the survey to reduce interviewer error during survey administration.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

The questions in the visitor survey address specific knowledge gaps related to current use of the park by visitors and the impact of ORV management plans on visitation plans. We know

of two visitor surveys conducted at CAHA on the topic of ORV use. Vogelsong (2003)—sponsored by NPS—interviewed visitors at several locations in the park and asked general questions about current trips and some specific questions about ORV use. The survey was limited to a few locations in the National Seashore. Neal (2005) surveyed visitors staying at selected lodging facilities, as well as local residents who used the beach for recreation. This survey also contained questions about current trips and specific questions about ORV use. The Neal sample was largely a convenience sample. In May 2008, the NPS completed an external peer review of these two studies by a panel of five university experts. The panel concluded that the data from the surveys did not provide a sound scientific basis for evaluating the socioeconomic impacts of the action alternatives being considered in the draft EIS.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

The visitor survey does not involve any small entities.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

Should these data not be collected, NPS evaluations of ORV management policies on visitors and businesses would be made without input from a representative year-round sample of visitors. This could result in a less accurate analysis of the impact of ORV management alternatives in the EIS and for the rulemaking. The analysis will be conducted for low-, medium-, and high-impact scenarios for each action alternative. Without data from the visitor surveys, the ranges considered for these scenarios will be based on assumptions and available secondary data, rather than on responses from a representative sample of visitors.

Because the draft EIS must be completed before the visitor survey is finished, the data from the survey will be compared to the assumptions made in the draft EIS. If the survey data are different, NPS will issue a supplementary EIS with new analysis based on the survey data.

The sampling schedule and target sample size efficiently collect the data needed for providing the range of experiences from the interviews and for providing a robust estimation of survey data. Restricting the proposed sample size and schedule would risk compromising the significance and reliability of the information collected.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:
 - * requiring respondents to report information to the agency more often than quarterly;
 - * requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
 - * requiring respondents to submit more than an original and two copies of any document;
 - * requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;
 - * in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;
 - * requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
 - * that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or

- * requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

These circumstances are not applicable to this collection of data. These surveys consist of one-time interviews, so frequency of reporting, preparation or submission of documents, and retaining of records do not apply.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice [and in response to the PRA statement associated with the collection over the past three years] and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years — even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

A copy of the Federal Register Notice, published on June 17, 2009, on page 28719. In response to the Federal Register Notice, NPS received a number of comments. The comments and NPS response are summarized below.

- (1) Comments supporting or opposing the closure of beaches to beach driving. NPS received a number of comments either supporting or opposing closing the beaches in CAHA to driving. These comments relate to possible management actions NPS might take, but do not relate to the need for the information collection or the burden of the collection.
- (2) Comments on the wording of the questions. NPS received comments on the wording of specific questions. One comment suggested revisions to the description of the nesting shorebirds and turtles. The original question used the word “endangered;” however this word has a specific legal meaning. The wording was changed to “protected.”
- (3) Comment on additional questions. NPS received a number of comments suggesting additional questions. In response, we added a question on local resident visitation to the park during 2007. We also added a question about the primary purpose of the trip.

NPS consulted with a variety of persons outside the agency to prepare the survey. Most of the consultation occurred with members of the Federal Regulatory Negotiating Committee authorized to provide NPS and CAHA with input on the ORV management issue. The committee consisted of a wide variety of stakeholders, including businesses that will be directly affected by the proposal, individuals who live outside the community but own property near CAHA, as well as other stakeholders. The committee formed a subcommittee on the economic analysis of the proposed alternatives. This subcommittee received more detailed information on the survey plans and provided feedback to the NPS and to RTI.

The survey instrument is based on similar surveys conducted by the contractor at other National Park System units. While the issues are somewhat different, the previous experience

interviewing visitors provides guidance on the wording of the questions, respondents' ability to answer such questions during on-site interviews, and the likely length of the interviews. In addition to the outside consultation described above, survey researchers at RTI who have conducted beach-intercept surveys (Dr. F. Reed Johnson) and recreation surveys (Dr. Christine Poulos and Dr. Carol Mansfield) provided input on the question wording. The sampling plan benefited from feedback provided by RTI sampling statisticians and survey administrators.

- 9.** Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

No payment or gifts will be provided to respondents.

- 10.** Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

Confidentiality will not be pledged. Names and addresses of visitors will not be collected in association with this research. Thus, anonymity will be ensured.

- 11.** Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

No questions of a sensitive nature will be asked. In addition, respondents are advised that their answers are voluntary.

- 12.** Provide estimates of the hour burden of the collection of information. The statement should:

- * Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.
- * If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.
- * Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.

Table A2. Projected Number of Respondents, Completion Times, and Burden Hours for CAHA Visitor Surveys.

	# of Respondents	Frequency of Response	Completion Time	Burden Hours
Completed surveys	1,200	1	20 min	400
Estimated refusals	800	1	2 min	27
TOTAL	2,000			427

The visitor survey takes about 20 minutes to complete with the revisions. Experience with the survey gained during the emergency clearance period shows that the survey is taking longer than originally expected, in part because respondents are interested in the topic and have been providing more detail and additional information in their responses.

Approximately 2,000 visitors will be approached and asked to participate in the survey. A 2002 visitor survey at CAHA achieved a response rate of 74%, but this was a very short on-site interview, followed by a mailback survey and was conducted only during the summer season. For this study, we assumed a 60% response rate, meaning that approximately 800 visitors will refuse to participate. The refusals will result in approximately 2 minutes of burden each, for a total of 27 hours. We expect that 1,200 visitors will respond to the survey, for a total of 400 hours of burden, assuming a 20-minute interview. Using the Bureau of Labor Statistics national wage information, the most recent published report (March 2009) lists an average hourly wage of \$29.18 (<http://www.bls.gov/news.release/pdf/ecec.pdf>). Within this hourly figure, \$20.37 is accounted for in hourly wages and salaries and \$8.81 for benefits. Thus, the estimated annualized cost to respondents for the hour burden is \$8697.99.

- 13.** Provide an estimate of the total annual [non-hour] cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).
- * The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information [including filing fees paid]. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.
 - * If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
 - * Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

The cost burden on respondents and record-keepers, other than hour burden, is zero.

- 14.** Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

The estimated annualized cost to the Federal government is \$101,683 (Table A3).

Table A3. Annualized Cost to the Federal Government

Expense category	Cost
Labor plus overhead	\$83,221
Travel + incidentals	\$15,837
Equipment	\$2,625
TOTAL	\$101,683

15. Explain the reasons for any program changes or adjustments.

Minor adjustments to the survey instrument used during the emergency clearance period (summer and fall 2009) were made in response to public comments generated by the Federal Register notice published on June 17, 2009 and results of a pilot test conducted in mid-August. Adjustments in fielding procedures also were made based on result of the pilot test.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

The visitor survey received emergency OMB approval in May 2009. A pilot test was conducted in August and survey administration began in mid-August. Because a year-round visitor sample is needed for the final EIS and rule-making, a 60-day *Federal Register* notice was published on June 17, 2009 to initiate a regular ICR. This will allow the visitor surveys to continue after the expiration of the emergency clearance.

Table A4. Visitor Survey Schedule.

	May-July 2009	Aug – Nov 30, 2009	Jan 2009 – July 2010	July-Aug 2010
Emergency clearance and publication of 60-day FR notice for regular clearance	x			
Construct sample	x			
Conduct interviews under emergency clearance		x		
Continue interviews under regular clearance			x	
Data analysis				x
Prepare text for Supplemental EIS if needed based on results				x
Prepare text for final EIS and final rulemaking if needed based on results				x

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

We are not seeking such approval.

18. Explain each exception to the certification statement.

There are no exceptions to the certification statement.

Attachments: Supporting Materials

- A. Consent Decree of April 30, 2008
- B. Executive Order 12866
- C. Executive Order 13258
- D. Executive Order 13422
- E. Regulatory Flexibility Act of 1980 (excerpts)